

Former Whitewebbs Park Golf Course

Local Planning Authority: Enfield

Local Planning Authority reference: 24/00987/FUL

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Change of use of former golf course to provide a football training centre and publicly accessible parkland, with a replacement café, public toilets and a flexible community space.

The applicant

The applicant is **Tottenham Hotspur Football Club** and the architect is **F3**.

Strategic issues summary

Land use principles: The proposed development is inappropriate development within the Green Belt. Very special circumstances which outweigh the harm to the Green Belt could be established subject to the public benefits being appropriately secured.

Heritage and design: Less than substantial harm is identified to three listed Grade II buildings (two low level and one a very low level). The public benefits could outweigh this harm if secured appropriately. Officers will conclude on this matter at the Mayor's decision making stage.

Transport: Further information is required to justify the quantum of car parking proposed; the Active Travel Zone Assessment should be updated to include night time assessment; and relevant management plans should be secured.

Other issues on **sustainable development** and **environmental issues** also require resolution prior to the Mayor's decision making stage.

Recommendation

That Enfield Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 77. Possible remedies set out in this report could address these deficiencies. The Mayor does not need to be consulted again if the borough decides to refuse the application.

Context

1. On 19 April 2024 the Mayor of London received documents from Enfield Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following category of the Schedule to the Order 2008:
 - 3D "*Development on land allocated as Green Belt which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building*".
3. Once Enfield Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; or, allow the Council to determine it itself. In this case, the Council need not refer the application back to the Mayor if it resolves to refuse permission.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

Site description

5. The 53 hectares site is wholly located within designated Green Belt land. The site is a former golf club in Enfield comprising a former golf course, two clubhouses, ancillary buildings and parking which ceased use in 2021 and has been unmanaged since. The site is bound by Whitewebbs Wood to the north and east, and Whitewebbs Park to the east and south.
6. Land to the east of the site is owned by Tottenham Hotspur Football Club and comprises the football club's training centre, used permanently by the men's and academy teams, as well as being temporarily used for the women's team. To the west of the site is Whitewebbs Wood which is a Site of Metropolitan Importance for Nature Conservation. The North Lodge, a Grade II listed building, is adjacent to the site, within the wood. The northwestern part of the site comprises Ancient Woodland.
7. The site is not directly served by public transport with the nearest London bus route stop located approximately 225 metres from the sites southern access point. Crews Hill station is the nearest rail station located approximately 2.5 kilometres to the west. The site has a PTAL rating of 0 on a scale of 0 to 6 where 0 is the lowest.

Details of this proposal

8. The application is for the change of use of the former golf course to provide a football training centre and parkland. The development involves:
 - Installation of football pitches (eight full size and two half size pitches) and associated infrastructure (including ball stop fencing, perimeter rails, goal posts storage, dug-outs, and pitch-side WC's, as well as floodlights to two of the northern pitches);
 - Alterations and extension to existing Northern Clubhouse building to provide a football training centre and associated uses (Sui Generis);
 - Modifications to existing Southern Clubhouse to form a replacement café and public toilets, and partial change of use to provide a flexible community space (Use Class F1/F2 and E);
 - Restoration and enhancement of parkland, including new footpaths and reinstatement of historic carriageway in Whitewebbs Wood;
 - Demolition of grounds maintenance building and construction of replacement grounds maintenance building;
 - Construction of a gatehouse;
 - Hard and soft landscaping, including land reprofiling;
 - New vehicular and pedestrian access and modifications to existing access and parking; and
 - Restoration of Whitewebbs Pond.

Case history

9. The Applicant engaged the GLA in pre-application discussions seeking in-principle advice. On 4 October 2023 the GLA issued this advice which set out the development would comprise inappropriate development in the Green Belt which would require Very Special Circumstances.

Strategic planning issues and relevant policies and guidance

10. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises The Enfield Plan Core Strategy (2010); Enfield Development Management Document (2014); and the London Plan 2021.
11. The following are also relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance; and
 - Enfield Local Plan (Regulation 19 draft).

12. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
- Green Belt - London Plan;
 - Playing fields - London Plan;
 - Sports facilities - London Plan; Social Infrastructure SPG;
 - Urban design - London Plan; Character and Context SPG; Public London Charter LPG; Characterisation and Growth Strategy LPG; Optimising Site Capacity: A Design-Led Approach LPG;
 - Fire Safety – London Plan; Fire Safety draft LPG;
 - Heritage - London Plan;
 - Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG
 - Sustainable development - London Plan; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; ‘Be Seen’ Energy Monitoring Guidance LPG; Energy Planning Guidance; Mayor’s Environment Strategy;
 - Air quality - London Plan; the Mayor’s Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air quality positive LPG; Air quality neutral LPG;
 - Transport and parking - London Plan; the Mayor’s Transport Strategy; Sustainable Transport, Walking and Cycling LPG;
 - Green Infrastructure - London Plan; the Mayor’s Environment Strategy; All London Green Grid SPG; Urban Greening Factor LPG.

Land use principles

Green Belt

13. The application site is located within designated Green Belt land and is currently occupied by the former Whitewebbs Park Golf Course, including the golf course; two clubhouses; and car parking. London Plan Policy G2 seeks to protect the Green Belt from “inappropriate development”, affording the strongest possible protection to Green Belt land in line with the requirements of the National Planning Policy Framework (NPPF).
14. Paragraph 152 of the NPPF advises that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

15. Paragraph 153 of the NPPF states that local planning authorities should ensure that substantial weight is given to any harm to the Green Belt when making planning decisions and confirms that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
16. Paragraph 154 of the NPPF regards the construction of new buildings as inappropriate in the Green Belt, with exceptions to this including the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport/recreation, as long as the facilities preserve the openness of the Green Belt and do not conflict with the purpose of including land within it. Although the proposed development would be for sport facilities, it is considered that the proposed development would not preserve the openness of the Green Belt compared to what is existing, by way of:
 - Enclosure of the training grounds with a new permanent boundary treatment; ball-stop fencing around the pitches and use of floodlighting to two of the pitches;
 - Significant new extensions to the northern clubhouse;
 - Erection of other new ancillary buildings on greenfield land;
 - Increased traffic movements; and
 - Consequential visual impacts on openness (impacts on long views, visual links intervisibility etc).
17. As such, the scheme does not meet the NPPF exceptions test and is therefore inappropriate development in the Green Belt and very special circumstances are required.

Very special circumstances

18. The application materials set out considerations for very special circumstances (VSC) case. The key points raised in the application materials are discussed below.
19. The Applicant sets out the need for the proposed development, citing the Government's independent report "Raising the bar – reframing the opportunity in women's football" (Department for Culture, Media & Sport, report updated 17 July 2023) which identifies opportunities to improve women's football in England and sets out strategic recommendations to provide world-leading standards for players, fans, staff and everyone involved in women's football. The Applicant sets out that the proposed development would provide facilities comparable to the men's teams facilities (ensuring gender equality), where the current female facilities are sub-standard, comprising temporary accommodation that does not provide the full range of facilities necessary and requiring transport of players between facilities. It is also noted the current temporary facilities will no longer be available after January 2025. The Applicant has also noted that due to the proposed standard, the facilities have

the potential to be used by international teams, as the men's facilities currently are.

20. The Applicant also sets out the appropriateness of the location for this development as it is adjacent to the existing men's training facility (GLA Officers note this is also on Green Belt land) which enables sharing of some facilities, thereby reducing the amount of built development required while still ensuring high quality. Shared facilities would include media centre (531 sq.m.); indoor pitch (3,645 sq.m.); dexa (bone density) scanner (27 sq.m.); cryotherapy room (10 sq.m.); auditorium (95 sq.m.); administrative/office functions (244 sq.m.); recreation room (2,224 sq.m.); amphitheatre (129 sq.m.); outdoor player recreation area (170 sq.m.); and player/staff accommodation (3,980 sq.m.). The Planning Statement supporting the applications states that the only way to achieve this sharing of facilities is by developing adjacent to the existing facilities (including establishing internal connection routes). The Planning Statement sets out a sequential site assessment establishing the majority of sites nearby are designated Green Belt or Metropolitan Open Land and that land falling outside these designations would not be of a size to accommodate the scale of development required. The Planning Statement also notes the existing sport/recreation use of the site (golf club) as contributing towards the suitability of the site for the proposed development.
21. In terms of public benefits, the proposals would deliver:
 - public access to 35 hectares of open space as well as improvements to the quality of this space;
 - improvements to nature and biodiversity including securing biodiversity net gain, planting 2,000 new trees on site, providing new habitats for existing and future wildlife, and creation of a new biodiversity corridor that links to Dickenson's meadow;
 - improvement to football facilities available for women and girls from community/grassroots level to professional level;
 - on site education facilities to ensure players have good access to both education and training;
 - development of a formal community programme to provide pathways and access for women and girls into football, to be provided both on site within the proposed facilities and off site within local communities (the Applicant has committed to agreeing a minimum number of hours, to be secured via S106 Agreement);
 - community access to facilities (hours and arrangements to be secured via S106 Agreement);
 - enhanced local walking and cycling routes;
 - approximately 212 full time equivalent (FTE) construction jobs over the 27-month construction period, and 65-82 net FTE permanent operational jobs;
 - estimated £2 million wages and £347,000-£432,000 employee spending per year;

- training and apprenticeship programmes for local students; and
 - establishing a Turf Academy focussing on horticulture, turf and sports ground maintenance, comprising education courses and on-site practical experience.
22. GLA Officers consider the proposed development would make an enhancement to the biodiversity value of the site through new and enhanced woodland areas and enhanced areas of grassland and ponds, as well as enhancement to the recreational value, including through the provision of cycle and pedestrian access routes across the site, a Visitors Centre and a football training centre. GLA Officers also consider the proposed development has the potential to provide significant benefits by way of local investment; employment and training; provision of public open space; access to high quality facilities for local groups; and increased opportunities for women and girls involvement in football.
23. In addition to the benefits of the scheme, GLA Officers acknowledge the benefits of locating the proposed facility adjacent to the existing men's training facility which enables sharing of some facilities and therefore a reduction in the amount of building works required.
24. It is considered that very special circumstances could be established which outweigh the proposed harm to the Green Belt subject to further information regarding the public benefits of the scheme. Prior to Stage 2, the final public benefits package should be confirmed and secured appropriately to enable Officers to conclude on this matter at the Mayor's decision making stage.

Sports facilities

25. London Plan Policy S5 seeks to ensure there is sufficient supply of good quality sport and recreation facilities and requires development proposals for such facilities to increase or enhance provision in accessible locations; maximise the multiple use of facilities; and support the provision of sports lighting within reasonable hours. Policy S5 also seeks to retain existing sports and recreational land (including playing fields) and facilities for sports.
26. The site is a former golf course with use ceasing in 2021. The proposed change of use would not only maintain a portion of the wider site for sporting purposes but also provide facilities and access to a greater number of people as the Applicant would make the facilities available to community groups (to form part of the S106 Agreement) and has committed to developing a programme for the local community to increase participation of women and girls in football (both on site and off site activities). The proposals would also provide 23 hectares of new publicly accessible park land for recreational use and 12 hectares of publicly accessible woodland. This would comply with Policy S5.
27. The Regulation 19 draft Local Plan allocates the site for nature recovery uses and professional sport, recreation and community sports/leisure uses, including ancillary related facilities. The proposed use, which includes opening up part of the site for public access, would be consistent with the draft allocation.

28. The development of the site for a sports facility could be acceptable in land use terms, where the site would remain in use for provision of sport facilities and would accord with London Plan Policy S5, as well as being consistent with the draft site allocation.

Heritage and design

Heritage

29. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. The NPPF states that in weighing applications that affect non-designated heritage assets, a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset.
30. The southern tip of the site (land around the South Lodge) is within the Clay Hill Conservation Area. The site is also in the setting of the designated heritage assets in the table below.
31. GLA officers consider that the following levels of indirect harm are caused by the proposed development (in all cases the assessment is based on the cumulative scenario); the scale used for less than substantial harm is very low, low, low to middle, middle, middle to high, high and very high.

Table of indirect (setting) impacts			
Heritage asset	Category of harm	Extent of harm	View reference
Elsyng Palace, Scheduled Monument	No harm	No harm	No view provided, asset is below ground
Flash Road Aqueduct, Scheduled Monument	No harm	No harm	View 10
Forty Hall, listed Grade I and associated Registered Park and Garden, Grade II	No assessment possible	No assessment possible	View 8
North Lodge, listed Grade II	Less than substantial	Low	Heritage Statement Para 8.5
South Lodge, listed Grade II	Less than substantial	Low	Heritage Statement Para 8.6
The King and Tinker Public House, listed Grade II	Less than substantial	Very low	Heritage Statement Para 8.9
The Rose and Crown Public House, listed Grade II	No harm	No harm	No view provided

Whitewebbs Farmhouse and associated barn, listed Grade II	No harm	No harm	No view provided
Forty Hill Conservation Area	No assessment possible	No assessment possible	Views 9 and 10, Heritage Statement Paras 6.44 8.12
Clay Hill Conservation Area	No harm	No harm	View 7, Heritage Statement Paras 6.24 and 8.13

32. The proposals to demolish parts of the Southern Clubhouse (a golf clubhouse dating from around 1932 but repeatedly and poorly extended) and to provide some new buildings for a public café, community space, park warden's office and toilets are supported. These buildings are of no heritage interest themselves however it is noted the proposed design is sensitive to nearby heritage assets and the proposed works nearby to the entrance gates of the South Lodge and associated land cause no direct harm to the Clay Hill Conservation Area.
33. The proposed historically styled gates to the north and south of the site are supported and would form a small heritage benefit.
34. NPPF Paragraph 208 states that "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal." The proposed development is assessed to cause harm to the heritage assets and is therefore contrary to London Plan Policy HC1. At the Mayor's decision making stage GLA Officers will conclude on the public benefits of the scheme, which could outweigh the heritage harm if appropriately secured. GLA Officers request the LPA share a copy of the draft S106 Agreement when it is available to confirm this.

Fire safety

35. The application is supported by a fire statement which provides the information required by London Plan Policy D12 Part B however, prior to Stage 2 the Applicant should provide the qualifications and experience of the author to confirm they are a suitable assessor.

Inclusive access

36. The Design and Access Statement includes an inclusive design statement which sets out how the scheme incorporates inclusive design principles in line with London Plan Policy D5.

Transport

Access

37. Vehicular access to the proposed training facility and academy would be retained from Whitewebbs Lane via an existing route that serves Whitewebbs

House. This vehicular access point would be operated with security and a turnback on its approach from Whitewebbs Lane, enabling non-permitted vehicles to turn-around.

38. An operational access/link between the site and the existing men's training facility has been proposed to provide walking, cycling and cart operational access between the respective facilities, and improve access for the public using this east-west route. This would also enable off-highway access for vehicles transferring grounds maintenance goods, which would avoid using Whitewebbs Lane. The proposals also seek to restore the Historic Access to Whitewebbs House via the North Lodge to provide a separate access for visitors and customers of the Toby Carvery.
39. The proposed access arrangement is acceptable; however, the Council should satisfy themselves that all proposed accesses are safe by means of a stage 1 Road Safety Audit. It is welcomed that the proposal will include upgrades to statutory footpaths and bridleways for use by walkers, cyclists and horse riders, in order to support active travel.

Cycle parking

40. It is welcomed that both long-stay and short-stay cycle parking would be provided in line with the London Plan standards for the café and the new academy. In the absence of London Plan cycle parking standards for the proposed football training facility use, 36 spaces are proposed to be located at the Northern Clubhouse and the ground maintenance building to serve the academy and training facility. A total of 16 spaces are also proposed to be located at the southern clubhouse to serve the café and park. Prior to Stage 2, the Applicant should ensure the proposed cycle parking is located in the most safe and convenient locations for cyclists in line with the London Plan and the London Cycle Design Standards.

Car parking

41. The scheme proposes 107 car parking spaces relating to the northern facilities comprising 87 spaces for the women's training facility (including six Blue Badge spaces); 14 spaces associated with the grounds maintenance building (including one Blue Badge space); and eight spaces at the northern clubhouse (including six accessible spaces). In relation to the southern clubhouse, the Transport Assessment states there are currently 125 parking spaces, which would be formalised into 93 spaces under the proposed development however, this is not entirely clear and the proposed number should be clarified prior to Stage 2.
42. The London Plan refers to Sport England's guidance for sports facilities, which emphasises the importance of design for active travel and avoidance of over-providing car parking spaces. Prior to Stage 2, further justification is needed in respect of the proposed car parking quantum and how it aligns with Sport England's guidance and the London Plan.

43. 20% of all parking spaces would be provided with active electric vehicle charging and 80% of spaces would be provided with passive electric charging provision in line with London Plan Policy T6. It is welcomed that parking bays would be marked out in the car park; this would ensure that space in the parking area is used efficiently. Enfield Council should consider conditions to cap parking within the marked spaces.
44. A Car Parking Design and Management Plan should be secured by condition.

Trip rate and mode share assessment

45. Trip generation assessment has been undertaken with a net impact assessment comparing the proposal's impact against the previous use. As the previous use ceased in 2021, GLA Officers have considered the gross rather than the net increase. A total of 111 two-way vehicular trips in the AM peak and 87 in the PM peak have been forecast. Notwithstanding, it is considered the proposal would have no material impact on the capacity of the local highway network or nearby TLRN.
46. The Transport Assessment considers that the majority of trips would be undertaken by car, which is not consistent with the aspirations of the London Plan, MTS or Sport England to promote active travel for sports facilities. Noting the 0 PTAL location and proposed use, the Applicant should still be able to complement the transport offer at this site with options to reduce the dependence of private car trips. For example, coach and minibus provision and shuttle trips to/ from the site to the nearest rail stations. Access for youth players and students at the Turf Academy should be considered in that respect prior to Stage 2.

Healthy streets

47. The applicant has carried out an Active Travel Zone (ATZ) assessment on five routes, which links to the nearest railway stations: Turkey Street, Crews Hill and Gordon Hill; these routes are mostly rural or suburban by nature and parts of these routes have limited footway provision and limited passive surveillance. Prior to Stage 2, the Applicant should review accidents data along these routes to identify highway safety improvement opportunities to be in line with Mayor's Vision Zero objective.
48. As the proposed facility is primarily aimed for use by women and girls, the ATZ should also consider nighttime safety given activities on site are expected to continue until hours of darkness. Enfield Council should use the outcome to inform the need to secure pedestrian/ cycling/ public realm improvements from the proposal if necessary.

Servicing

49. In line with London Plan Policies T2 and T7(F), a draft Delivery & Servicing Plan (DSP) has been submitted. The proposed servicing strategy is principally supported and should be secured appropriately by the LPA.

Construction

50. In line with London Plan Policy T7, a draft Construction Logistics Plan (CLP) has been submitted in accordance with TfL's CLP guidance. The LPA should secure a full CLP by condition.

Travel plan

51. A Framework Travel Plan has been submitted and the LPA should appropriately secure a full Travel Plan. This should include measures to encourage cycling, car-sharing and "last-mile" to nearby stations, and any further measures to reduce car-trips as referred to in paragraph 46 of this report.

Sustainable development

Energy strategy

52. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2021 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.
53. An energy statement has been submitted with the application. The energy statement does not yet comply with London Plan Policies SI2, SI3 or SI4. The Applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and Applicant in a technical memo under separate cover; however outstanding policy requirements include:
 - Be Lean – further evidencing of energy efficiency measures for the non-domestic element;
 - Be Clean – demonstration that the number of energy centres has been minimised;
 - Be Green – demonstration that renewable energy has been maximised, including roof layouts showing the extent of PV provision and details of the proposed air source heat pumps;
 - Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;
 - Energy infrastructure – further details on the design of future district heating network futureproofing is required;
 - Managing heat risk – evidencing of actual vs notional cooling load.

Carbon savings

54. For the non-domestic element, the development is estimated to achieve a 72% reduction in CO₂ emissions compared to 2021 Building Regulations.
55. The development falls short of the net zero-carbon target set by London Plan Policy SI2. However, the development meets the minimum 35% reduction on

site required by policy. As such, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price. The draft S106 Agreement should be submitted when available to evidence the agreement with the borough.

Whole Life-cycle Carbon

56. In accordance with London Plan Policy SI 2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.
57. The applicant has submitted a whole life-cycle carbon assessment. The WLC assessment does not yet comply with London Plan Policy SI 2. Full details have been provided to the LPA and the Applicant under separate cover.
58. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA [website](#)¹.

Circular Economy

59. London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI 7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.
60. The applicant has submitted a Circular Economy Statement in accordance with the GLA guidance. The Circular Economy Statement does not yet comply with London Plan Policy SI 7. Full details have been provided to the LPA and the Applicant under separate cover.
61. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA [website](#)².

Environmental issues

Urban greening

62. The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.813, which exceeds the target set by Policy G5 of the London Plan. No further information is required.

¹ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

² <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

Flood risk

63. The site is located predominantly in Flood Zone 1 and all proposed development is located within Flood Zone 1, however, it is noted the southern section of the site is located in Flood Zone 3. The Applicant has submitted Flood Risk Assessment (FRA). The FRA adequately assesses the risk of flooding from fluvial/tidal, pluvial, sewer, groundwater, and reservoir flooding, which is considered to be low. As such, the FRA is considered to be generally in accordance with London Plan Policy SI 12. Notwithstanding, there is the potential for elevated groundwater beneath the site. Groundwater monitoring should be undertaken, ideally during winter months, to inform the exact mitigation measures required. The LPA should secure this by condition.

Sustainable drainage

64. The drainage strategy proposes to restrict runoff to 34.1 l/s for the 100-year event plus 40% climate change for the entire development. The drainage strategy proposes to provide the required attenuation within a combination of permeable paving; detention basins; and swales which is supported. In terms of SuDS the drainage strategy proposed permeable paving; rain gardens; and rainwater harvesting which is welcomed.
65. The scheme is generally in accordance with London Plan Policy SI 13 however, the LPA should ensure Enfield's version of the [London Sustainable Drainage Proforma](#)³ is completed and submitted to the Council.

Water efficiency

66. The Sustainability Statement notes that 3 Wat 01 credits are targeted for the non-residential uses on site, with water consumption reduced by 40%. Water efficiency fittings; water monitoring; leak detection systems and flow control devices are proposed. The proposed development generally meets the requirements of London Plan Policy SI 5.

Air quality

67. London Plan Policy SI 1 seek to ensure development proposals do not lead to further reduction of air quality or create unacceptable risk of exposure to poor air quality, requiring all development proposals to be at least Air Quality Neutral and designed to reduce exposure to existing air pollution and make provision to address local air quality problems. Policy SI 1 specifies that major development proposals must be supported by an air quality assessment.
68. The application was supported by an air quality assessment, including an air quality neutral (AQN) assessment. The AQN assessment concludes the development would be AQN for building emissions however, the development would not be AQN for transport emissions. The assessment specifies the

³ <https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/climate-change/climate-adaptation/surface-water-flooding/london-sustainable-drainage-proforma>

clubhouse building was used to calculate the transport benchmark however, it is not representative of the development as many of the trips would be for the outdoor football pitches. The guidance does not account for traffic generated by outdoor spaces, therefore there is no suitable benchmark for comparison. As such no strategic issues are raised however, the LPA should review the assessment to conclude whether any local mitigation would be required.

69. The air quality assessment also included a dust risk assessment however, this was undertaken with outdated guidance (2016) where IAQM (2024) guidance was available at the time of assessment. The guidance has different distances for dust risk assessment zones that will affect other parts of the assessment. The Applicant should review whether the updated guidance would change the overall risk level of the assessment and, where it does not, a statement should be provided to confirm this prior to Stage 2. Where the updated guidance does change the overall risk of the assessment, the assessment must be updated prior to Stage 2.
70. The LPA should secure conditions relating to Non-Road Mobile Machinery and measures to control emissions during demolition and construction (written into an Air Quality and Dust Management Plan or as part of a Construction Environmental Management Plan) in line with the Control of Dust and Emissions during Construction and Demolition SPG.

Biodiversity

71. The site is partially within Whitewebbs Wood Site of Importance for Nature Conservation (SINC) and a small area of the eastern boundary of the site is within Forty Hall Park and Estate SINC, both identified as being of Metropolitan Importance. In accordance with London Plan Policy G6 the Applicant should avoid impacts to the SINC and set out in the application how they will avoid direct or indirect impacts on the SINC. If avoidance of impacts is not possible the applicant should set out how they have followed the mitigation hierarchy to minimise development impacts.
72. The Ecological Impact Assessment identifies that there are likely to be construction impacts on the Whitewebbs SINC including pollutant loss; root protection area encroachment; noise; and light. The assessment also concludes that curing operations there is likely to be impacts caused by noise and light.
73. The Applicant has stated each pitch would be used for a maximum of 6 hours per week, therefore being a maximum of 12 hours of floodlighting possible, though likely to be less as not all hours of use may be after dark, and impacts could be further reduced by using floodlit pitches concurrently. The Applicant has committed to flood lighting use not being permitted after 20:00 which should be secured by the LPA. The applicant should also prepare a Construction Environment Management Plan (CEMP) to set out how such impacts will be avoided and mitigated in line with the sequential approach set out at London Plan Policy G6. The CEMP should be secured by planning

condition and approved prior to construction, if the proposed development is granted planning consent.

Local planning authority's position

74. Enfield Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

Legal considerations

75. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application. In this case, the Council need not refer the application back to the Mayor if it resolves to refuse permission. There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

76. There are no financial considerations at this stage.

Conclusion

77. London Plan policies on Green Belt; sports facilities; heritage; transport; sustainable design; and environmental issues are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:
- **Land use principles:** The proposed development is inappropriate development within the Green Belt. Very special circumstances which outweigh the harm to the Green Belt could be established subject to the public benefits being appropriately secured.
 - **Heritage and design:** Less than substantial harm is identified to three listed Grade II buildings (two low level and one a very low level). The public benefits could outweigh this harm if secured appropriately. Officers will conclude on this matter at the Mayor's decision making stage.
 - **Transport:** Further information is required to justify the quantum of car parking proposed; the Active Travel Zone Assessment should be updated

to include night time assessment; and relevant management plans should be secured.

- **Sustainable development:** Further information is required on energy; whole life-cycle carbon and circular economy.
- **Environmental issues:** Further information required in relation to air quality. The proposed development is generally compliant with London Plan Policies on urban greening; biodiversity; sustainable drainage and water efficiency.

For further information, contact GLA Planning Unit (Development Management Team):

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We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.